

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

Plaintiff,

v.

The Defendants Identified in Schedule A,

Defendants.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants Hangzhou Hibaby Technology Co., Ltd. (“Hibaby”) and Hibobi Technology Limited (“Hibobi” and, with Hibaby, “Defendants”) file this Motion under Local Rule 26.2 requesting leave to file the following documents under seal: (1) Defendants’ Response to Plaintiff’s Motion For Preliminary Injunction, To Expedite The Preliminary Injunction Hearing, And To Extend The October 4, 2022 Temporary Restraining Order; (2) Declaration of Liu, The Second Declaration of Liu, and (3) Exhibits B, C, D, F, G, H, I, J, O, Q, R, S, T, V.

Defendants and Plaintiff InterFocus, Inc. (“Plaintiff”) are competitors. In the underlying brief, Defendants provide the above highly sensitive business documents and information to support their Response to Plaintiff’s Motion for Preliminary Injunction, including IP license agreements, corporate structures, payment accounts, sales numbers, financial information, logistic information, and other confidential documents and information that are not generally known to others and have significant competitive value, such that unrestricted disclosure to the public and to the Plaintiff’s employees would create a substantial risk of serious injury. Defendants would

not normally reveal these documents and information to third parties except in confidence or has undertaken with others to maintain in confidence.

These documents and information constitute proprietary financial, technical, competitive, and commercially sensitive information that Defendants maintain as highly confidential in its business, the disclosure of which is likely to cause harm to the competitive position of Defendants.

Defendants also file Exhibit U under seal since it was originally filed under seal.

Pursuant to Local Rule 26.2(c), concurrent with the motion, Defendants have filed a complete version of the Response, the declarations, and the Exhibits provisionally under seal as well as a redacted version in accordance with the confidentiality designations.

WHEREFORE, Defendants respectfully request this Court grant Defendants' Motion for Leave to File Under Seal.

Dated: October 25, 2022

Respectfully submitted,

/s/ Ziyong Li

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Schedule A: Hangzhou Hibaby
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CERTIFICATE OF SERVICE

I certify that, on October 25, 2022, a copy of the foregoing *Motion to Seal* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Ziyong Li

Ziyong Li (*pro hac vice*)

*Attorneys for Defendants identified in Schedule
A: Hangzhou Hibaby Technology Co., Ltd. and
Hibobi Technology Limited*